

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE Y-mAbs THERAPEUTICS, INC.
SECURITIES LITIGATION

Civil Action No.: 1:23-cv-00431-AS

**NOTICE OF UNOPPOSED MOTION FOR ENTRY OF ORDER PRELIMINARILY
APPROVING SETTLEMENT AND ESTABLISHING NOTICE PROCEDURES**

PLEASE TAKE NOTICE that Lead Plaintiff Omar Miramontes (“Plaintiff” or “Lead Plaintiff”), individually and on behalf of all others similarly situated, will hereby move this Court on a date and at such time as may be designated by the Honorable Arun Subramanian, United States District Judge of the United States District Court for the Southern District of New York, 500 Pearl St., New York, NY 10007, for entry of an Order: (1) preliminarily certifying the Settlement Class for the purposes of settlement; (2) preliminarily approving the terms of the Settlement as set forth in the Stipulation of Settlement (“Stipulation”), filed concurrently herewith; (3) approving the form and method for providing notice of the Settlement; and (4) scheduling a Settlement Fairness Hearing and deadlines for mailing and publication of the notice, the filing of Settlement Class Member objections, the filing of Settlement Class Member opt-out notices, the filing of Plaintiff’s motion for final approval of the Settlement, and the filing of Lead Counsel’s application for attorneys’ fees and expenses.

This motion is based on this Notice of Unopposed Motion, the Stipulation and all exhibits attached thereto, Plaintiff’s supporting Memorandum of Law, all filed contemporaneously herewith, and all pleadings, records, and papers on file herein.

Defendants do not oppose the relief requested by this motion. Accordingly, Plaintiff request that the Court enter the [Proposed] Order Preliminarily Approving Settlement and Providing for Notice, a copy of which is attached as Exhibit A to the Stipulation.

Dated: June 27, 2024

Respectfully submitted,

/s/ Michael J. Wernke

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Additional Counsel

CERTIFICATE OF SERVICE

I hereby certify that on June 27, 2024, a true and correct copy of the foregoing document was served by CM/ECF to the parties registered to the Court's CM/ECF system.

By: /s/ Michael J. Wernke
Michael J. Wernke